

Gainful Employment

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Agenda

- Regulation
- Which Programs are GE Programs
- Important Dates
- Reporting
- Metrics
- Disclosures
- Certifications



Regulations

- Final Rule published October 31, 2014
 - Effective July 1, 2015
 - New Disclosures Effective January 1, 2017
- Dear Colleague Letter GEN 15-12 posted June 30, 2015



Which Programs are GE Programs

The HEA provides that to be Title IV eligible an educational program must be offered by:

- A public or non-profit postsecondary educational institution, if the program leads to a degree; or
- Any institution, if the program prepares students for "gainful employment in a recognized occupation"

Generally, all non-degree programs must lead to gainful employment

Generally, most programs at for-profit institutions must lead to gainful employment



Which Programs are GE Programs

- <u>Electronic Announcement #53</u> What is a Gainful Employment (GE) Program?
- GE Operations Manual



Important Dates

Reporting

July 31, 2015 (for 2008/2009 to 2013/2014 data)

Oct 1, 2015 (for 2014/2015 data) Program Certifications

Dec 31, 2015

Draft
Debt-to-Earnings
Rates

Summer 2016

Disclosures

Jan 31, 2015

(per Current Regulations) **Disclosures**

Jan 1, 2017

(per New Regulations)



GE Reporting

- Report all Title IV Students by July 31, 2015
 - Report 2008 2009 through 2013 2014 award years
 - Programs with Medical and Dental Residencies report 2007 – 2008 through 2013 – 2014 award years
- Report 2014 2015 Award Year by October 1, 2015



GE Reporting

- ONLY submit data on students enrolled in a GE program
- ONLY submit data on Title IV aid recipients
- ONLY submit data for programs that exist as of July 1, 2015
- Data provided in 2011 will not be available to reuse



GE Reporting

- Schools report GE Data to NSLDS using one of the following methods -
- Online
 - GE Add
 - GE Spreadsheet Submittal
- Batch
 - Fixed-Width
 - Comma Separated Values (CSV)



Reporting – Students to include

- All Title IV students enrolled in GE Programs
- A student enrolled in more than one GE Program must be reported separately for each program.
- A student who 'stopped out' and re-entered the same GE Program during the same award year must be reported separately for each enrollment.
- A student who was enrolled in the same GE Program during multiple award years must be reported separately for each award year.



Reporting Accuracy

- Data Quality
 - Completeness
 - Accuracy
 - Consistency
- Data Quality Reviews



More Information on Reporting

- GE Electronic Announcement #52 and #56 on NSLDS GE reporting
- Webinar recording: January 13 and 15, 2015
 - http://ifap.ed.gov/ifap/ifapMedia.jsp#2015GEWebinar 011515
- NSLDS Customer Support Center:
 - Phone: 1-800-999-8219
 - E-mail: nslds@ed.gov

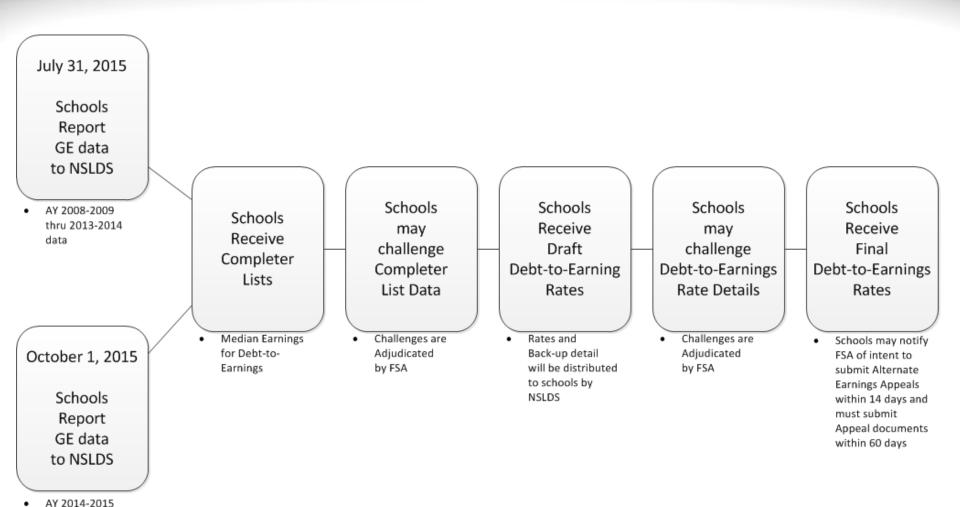


Debt to Earnings Measures



2015 NASFAA

New Orleans, LA July 19-22, 2015





Gainful Employment Measure

- Debt-to-earnings (D/E) rates
 - Annual Earnings D/E rate
 - Discretionary Income D/E rate
 - Passing: Annual D/E < = 8% or Discretionary D/E < = 20%</p>
 - Failing: Annual D/E > 12% or Discretionary > 30%
 - Zone: Annual D/E > 8% and < = 12% or Discretionary D/E > 20% and <= 30%</p>



Cohort Periods

- D/E rates are calculated using debt and earnings of students who complete a GE program during a specific cohort period
- Cohort period is either 2 or 4 years
 - Two-year cohort used if 30 or more students completed during the period
 - Four-year cohort used if fewer than 30 students completed during the two-year cohort period
 - If fewer than 30 students completed during the fouryear cohort period, D/E rates will not be calculated



Cohort Periods

- Two-year cohort is students who completed the program during the 3rd and 4th award years prior to award year for which rates are calculated
- Four-year cohort is students who completed the program during the 3rd,4th, 5th and 6th award years prior to the award year for which rates are calculated
- D/E rates calculation for 2014-2015
 - Two-year cohort period is 2010-2011 and 2011-2012
 - Four-year cohort period is 2008-2009, 2009-2010, 2010-2011 and 2011-2012



GE Rates Calculation

$$T = 2\pi \sqrt{\frac{m}{k}}$$

$$T = 2\pi \sqrt{\frac{0.425}{7.85}}$$

$$T = 1.46 \text{sec}$$

D/E Rates Calculation

- Discretionary Income Rate = annual loan repayment divided by (the higher of the mean or median annual earnings less(1.5 times the HHS Poverty Guideline))
- Annual earnings rate = annual loan payment divided by the higher of the mean or median annul earnings



D/E Rates Calculation

Annual loan repayment

- Calculated by determining the median loan debt of students who completed the program during the applicable cohort and amortizing that debt
- Includes private education loans and total amount outstanding on any other credit extended by the institution
- Capped at lesser of total amount of student's tuition and fees, books and supplies, and equipment or the total amount of debt the student incurred for the program



D/E Rates Calculation

Annual earnings

- Based on earnings obtained from SSA
- ED submits a list to SSA of students who completed the program during the cohort period and received Title IV aid
- SSA calculates and returns the mean and median annual earnings of students on the list for whom it was able to match earnings data for the GE "earnings year"
 - GE earnings year is 2 calendar years preceding the year in which D/E rates are calculated
 - SSA does not provide individual earnings data or the identity of any student



G/E Rates Calculations

Exclusions

- Any of student's Title IV loans are in a military-related deferment
- Any of student's Title IV loans have been approved or are under consideration for a T/P disability discharge
- Student was enrolled in any other program during the calendar year for which SSA earnings are obtained
- For undergraduate GE programs, student completed a higher-credentialed undergraduate program at the same institution
- For graduate GE programs, the student completed a highercredentialed graduate GE program at the same institution
- The student is dead



Gainful Employment Results

- Program's loses Title IV eligibility if:
 - D/E measures Fails in two out of three years
 OR
 - D/E measures Fails or in the zone for four consecutive years



Disclosures



Required Disclosures

- Occupations
- Normal time to complete program
- On-time graduation rate for completers
- Tuition & fees, books & supplies, room & board
- Placement rate for completers (as determined by State or Accreditor methodology)
- Median loan debt
- Other program information provided by the Secretary

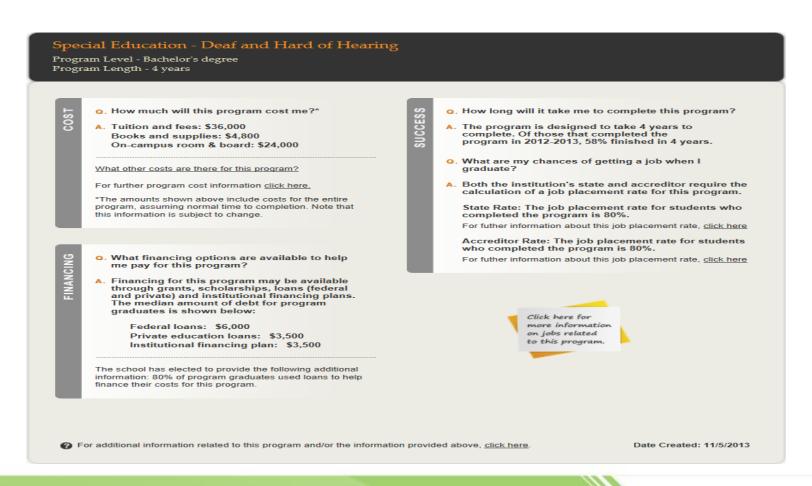


Disclosure Template

- The template is an application that creates a standardized Web page with the GE disclosure information
- Web page must be hosted on Institution's site



Disclosure Template





GE Disclosure Resources

- GE Disclosure Template <u>http://www2.ed.gov/policy/highered/reg/he</u> arulemaking/2009/negreg-summerfall.html
 - Requirement
 - Template application
 - Quick start guides
 - Bulk data file upload tool
 - Help desk: (855) 359-3697, gedt@inovas.net

Disclosures Under New Final Rules

- Transition from current disclosure requirements to requirements of the final regulations
 - Consumer testing & Focus groups
 - Seek comments on new disclosure template
 - Guidance and technical assistance
- Delay in effective date of new disclosure requirements until January 1, 2017, gives the Department time to conduct consumer testing and prepare new disclosure template



Certifications

- December 31, 2015 Transitional Certifications Due
 - Signed by CEO, Chancellor, or equivalent
- Certifications renewed when institution recertifies Program Participation Agreement (PPA)

Certifications

- Certify that each currently eligible GE Program is:
 - Approved by accrediting agency and State
 - Is programmatically accredited if that is required for that profession in the state
 - Graduates qualify to meet educational prerequisites of the licensing or certification exam required to work in the state, if any

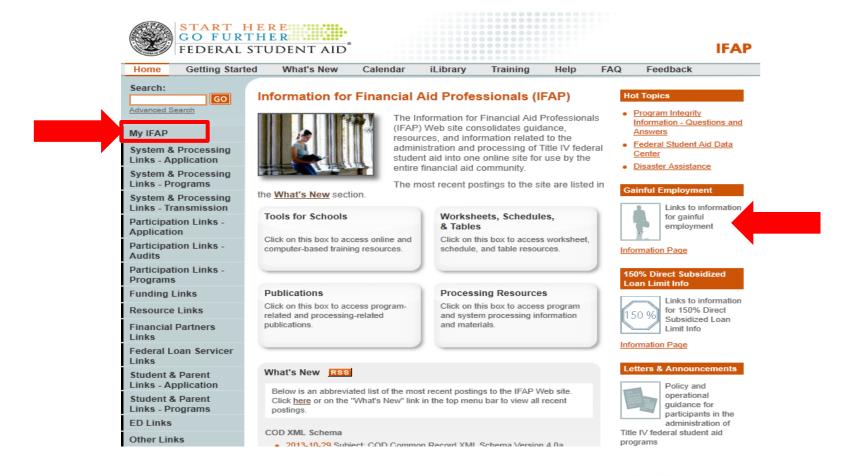


Certifications

- New Electronic Announcement #54
- Link to E-App: https://eligcert.ed.gov/
- Email <u>GECertification@ed.gov</u>



GE Resources







Gainful Employment Information Page:

http://www.ifap.ed.gov/GainfulEmploymentInfo/indexV2.ht ml

Thank you!

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